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February 16, 2000

Department of Health and Human Services Assistant
 Secretary for Planning and Evaluation
 Attention: Privacy-P, Room G-322A
 Hubert H. Humphrey Building
 200 Independence Avenue, SW
 Washington, DC 20201

Re: Proposed Privacy Standards -- 64 Fed. Reg. 59978 (Nov. 3, 1999)

Dear Assistant Secretary:

The National Council for Prescription Drug Programs (NCPDP) is pleased to submit the following comments regarding the proposed privacy standards for individually identifiable health information.

NCPDP is a non-profit ANSI-accredited Standards Development Organization consisting of more than 1,100 members who represent computer companies, drug manufacturers, pharmacy chains and independents, drug wholesalers, insurers, mail order prescription drug companies, pharmaceutical claims processors, physician services organizations, prescription drug providers, software vendors, telecommunication vendors, service organizations, government agencies and other parties interested in electronic standardization within the pharmacy services sector of the health care industry.

Although NCPDP supports keeping patient identifiable information confidential it cannot support these proposed privacy regulations as written because they completely miss their stated goal of "administrative simplification" for the specific reasons outlined in our comments below. In addition, the proposed privacy regulations not only put an undue administrative and financial burden on the covered entities, but also could adversely impact patient health care by delaying individual health care services, and reducing the sharing of patient information that is essential for the provision of optimal patient care.

Applicability-sections 164.104 and 164.502 (F.R. page 60052).

The proposed regulations are much broader than their very narrow and restrictive enabling legislation... section 264(c)(i) of the Health Insurance Portability and Accountability Act of 1996 (HIPAA):

"If legislation governing standards with respect to the privacy of individually identifiable health information transmitted in connection with the transactions described in section 1173(a) of the Social Security Act (as added by section 262) is not enacted by the date that is 36 months after the date of the enactment of this Act, the Secretary of Health and Human Services shall promulgate final regulations containing such standards not later than the date that is 42 months after the date of the enactment of this Act. "

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The Congressional mandate is clear... the proposed privacy standards regulations must only apply to the privacy of individually identifiable health information as it is transmitted in connection with the transactions described in section 1173(a). Only individually identifiable health information contained in these electronically transmitted transaction standards may be the subject of these proposed privacy standards regulations. Therefore, these proposed privacy regulations must be rewritten to conform to the intent of Congress.

In addition, Congress only authorized the Secretary to "promulgate final regulations containing such **standards**" (Emphasis added.) not the implementation specifications that represent most of the proposed privacy regulations.

Not only should these implementation specifications be eliminated because they were not authorized by Congress, but also to allow the covered entities to tailor their own implementations of the federal standards resulting in maximum flexibility and scalability that is "consistent with good health professional practices and ethics".

Consistent with the statutory interpretation immediately above, NCPDP does not believe that paper records are, or should be, covered by these proposed regulations. However, if they were, it would seem difficult if not impossible to determine what paper is subject to the proposed regulations and what paper is not.

NCPDP does not believe that the privacy regulations should attempt to create a protection distinction between more sensitive patient identifiable health care information. This distinction would be far too subjective resulting in uneven implementation of the proposed regulations resulting in increased liability for the covered entities in addition this would probably result in delayed health care services for individuals as the entities attempt to determine what they must legally do under a plethora of individual factual situations.

Definitions -section 160.103 (F.R. page 60049)

"Health care clearinghouse"... The definition of "health care clearinghouse" must be amended by adding "intermediaries" to the list in the sentence that begins with, "Billing services, repricing companies..."

Definitions-section 164.504 (F.R. page 60052).

"Disclosure"... The definition of "disclosure" must be amended by adding at the end of that definition "other than to the individual who is the subject of the information". This change would make it clear that a health care provider may release an individual's protected information to that individual without first requiring that the patient complete an authorization form.

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“Payment”... (page 60053)... the definition of “payment” must be amended by replacing “medical data processing” with the broader term “related healthcare data processing”.

It is necessary to draw this line as clearly as possible so that the covered entities know what they can and can not do. NCPDP offers the following minor changes that would facilitate the maximum disclosure of information to an individual without requiring that individual to complete the authorization form and also to better reflect the intent language on page 60003:

“Only those covered entities who disclose health information to marketers, reporters, privacy investigators, researchers, and others for purposes **unrelated** to treatment, payment, and health care operations are required to get the written consent of the patient in accordance with this rule.” (Emphasis added.)

Third Party Beneficiary to Business Partner Contract...Section 164.506(e)(2)(ii)(A) (F.R. page 60055).

This provision creates uncertainty whether or not switches, value-added networks, other important participants in the claims transmission process, pharmacists, insurance companies, and **PBMs** will be considered “business partners”. For these reasons, we recommend that this provision must be rewritten.

This provision would also provide a new federal right of action for individuals in those states that recognize a cause of action if a party is named in a contract as a third party beneficiary. Congress did not authorize nor intend that the Secretary provide a new cause of action for a breach of a business partner contract required by these proposed privacy regulations. For this reason this provision must be deleted.

Authorization Required... section 164.580 (F.R. page 60055-60056).

The Authorization for Release of Information form on page 60065 must be clarified for the benefit of both covered entities and individuals. The last sentence on that Authorization form must be rewritten to better reflect section 164.508(a)(2)(iv): “No authorization is necessary to use or disclose protected health information to carry out treatment, payment, or health care operations, except when the information to be released is psychotherapy notes or research information that is unrelated to treatment.”

Disclosures for Banking and Payment Processes... Section 164.510(i) (F.R. page 60058).

This subsection must be clarified to assure that pharmacy benefit cards are not considered “**or** other payment card, or other payment means...”. Otherwise, the National Council for Prescription Drug Programs (NCPDP) payment claim, which is expected to be adopted by HHS as the national pharmacy payment claim, may have to

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be modified to only provide the “minimum amount of protected health information necessary to complete a banking or payment activity...”.

In addition to payment, the NCPDP payment claim also facilitates concurrent drug utilization review. Because of its importance in improving patient care, concurrent drug utilization review was mandated by Congress in the Omnibus Budget Reconciliation Act of 1990 (OBRA 90). Although NCPDP's role is not as the entity conducting such reviews, NCPDP electronic payment claim format creates the real-time ability for pharmacies to have access to information that may be necessary to meet the requirements of this federal and similar state laws.

Health care information carried on an NCPDP payment claim goes beyond claims payment and may include information that could be used to provide professional pharmacy services, such as compliance, disease management, and outcomes programs. Such information must not be arbitrarily restricted by the application of the “minimum necessary standard”.

The “minimum necessary standard” will also be impossible to implement concerning the information provided on the NCPDP payment claim to pharmacies for concurrent drug utilization review. The “minimum necessary standard” is completely at odds with trying to provide as much information as possible to help assure that optimal care can be provided. It is very naïve for HHS to believe that health care providers will know in advance what patient information they will need in order to provide optimal patient care. In addition, it is just as naive for HHS to believe that covered entities providing this information to providers will be able to determine what is the “minimal” amount. The “minimal necessary standard” will surely have a chilling effect on sharing patient identifiable health care information resulting in less than optimal patient care and resulting in increased malpractice litigation. In short, the “minimum necessary information standard” is bad public policy and for the reasons stated above should be deleted.

Non-Preemption of State Law... subpart B (F.R. pages 60050 and 60051).

Lack of Federal preemption will make it difficult if not impossible for covered entities to know what law they must follow. This is more than a mere inconvenience and expense to the covered entities... individual patients will likely suffer when their health care is interrupted while they wait while the covered entities struggle to try to understand what law to follow.

Conflicts between these proposed regulations and state laws would occur because of the lack of federal preemption. The practical significance is that the covered entities would have to know... for every conceivable factual situation that could present itself... the applicable state law, federal law, whether or not a conflict exists between these two bodies of law, and finally how to resolve that conflict correctly under the penalty of law.

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There probably are not enough lawyers available to the covered entities that would be necessary to determine immediately what law must be followed in the real-time of electronic transactions and patients waiting for their prescriptions. The only solution would appear to have Congress enact privacy legislation that does preempt state law. Without federal preemption of state privacy laws these proposed regulations are fatally flawed and therefore should not be finalized.

Disclosures by Whistleblowers... section 164.518(a)(4) (F.R. pages 60062).

This "implementation specification" should be rewritten in a less confrontational tone. Specifically, a would be whistleblower should first be required to raise the issue of a possible violation of these regulations with the covered entity before going to an attorney, oversight agency, or law enforcement official. The proposed regulations should assume that the covered entities will act in good faith to comply with these privacy requirements.

Any meaningful government-private sector "administrative simplification" effort must be based upon cooperation and mutual respect, not on government actions that alienate employees from their employer. Compliance in good faith should be presumed... not only in this provision, but also in all of the proposed regulatory provisions. Sufficient punitive provisions are included in these proposed regulations to address the exceptions to this general good faith presumption.

Compliance and Enforcement... section 164.522 (F.R. pages 60063 and 60064).

Section 164.522(b) should be modified to allow 90 days for the covered entities to resolve the complaint before the individual may submit that complaint to the Secretary. The Secretary already has this authority to make this suggested change... section 164.522(b)(1)(iii): "The Secretary may prescribe additional requirements for the filing of complaints...". This suggested change would reduce the administrative burden on the Secretary and, even more importantly, encourage the covered entities to work out complaints with their patients. Again, the regulations should reflect a presumption that covered entities will act in good faith in complying with government regulations... it is not a good business practice to act in ways that will drive your patients to your competitors.

Costs of Implementing the Privacy Regulations as Proposed is Likely to be Much Higher than the Secretary has Estimated.

Although time did not permit, NCPDP estimates that the proposed regulations will add substantial costs to the pharmacy claims adjudication system. The proposed regulations will require changing the NCPDP payment claim format to include a field to notify future users that the individual has contested the accuracy of at least a part of the drug payment claim information.

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The contested notice will take up additional bytes of space, which generates a number of associated costs: reprogramming the claims processing system and the costs of processing the increased record length and storage costs for the extra information.

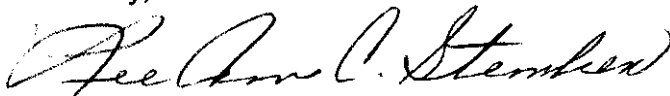
HHS estimates the "cost of compliance with the proposed rule would be at least \$3.8 billion over five years" (F.R. page 60006). However, the October 19, 1999, Report by **BlueCross BlueShield** Association (by Robert E. Nolan Company) of similar proposals, many of which are included in this proposed rule, estimates cost at over 10 times that amount... \$43 billion over five years.

However, cost should not be viewed in a vacuum. What will all the money required to be spent by these proposed regulations buy? According to HHS at F.R. page 59923... "the **HIPAA** legislative authority is more limited in scope than the federal statute we recommend, and does not always permit us to propose the policies we believe are optimal". Buying less than optimal privacy protection does not sound like a good bargain for the covered entities or the American people.

We agree with the Secretary that "there is an urgent need for legislation to establish comprehensive privacy standards for all those who pay and provide for health care, and those who receive information from them". (F.R. page 59923)

These proposed regulations should not be implemented because they are not as comprehensive as they must be to provide optimal privacy protection for patient identifiable health care information and could delay health care services to individuals. Federal privacy legislation that preempts state law is the only reasonable solution to resolve this issue and we urge Congress to make it their number one domestic priority this year.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Ann C. Stember", written in a cursive style.

Lee-Ann C. Stember
President

CC: NCPDP Board of Trustees

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	Matthew A. Muscha
Voting Ctggy: G	Member Count: 6
DOD PharmacoEconomic Center	
	Donald W. DeGroff
Voting Ctggy: G	Member Count: 1
DP/Rx Corporation	
	Ira Chabrowe
Voting Ctggy: Y	Member Count: 1
Drug Emporium, Inc.	
	Matthew E. Erick, R.Ph.
	Peter M. Johnson
	Robert L. Killoran, R.Ph.
Voting Ctggy: P	Member Count: 3
DrugEmporium.com	
	Lisa S. Head
Voting Ctggy: p	Member Count: 1
Drugstore.com, Inc.	
	Marc Lilly
	Alex Shmelev
Voting Ctggy: y	Member Count: 2
E Physician	
	Damon Koronakos, M.D.
	Jonathon Levine
	Adrian Wong, R.Ph.
Voting Ctggy: y	Member Count: 3
e-Mds, Inc.	
	Charles A. Frederick, R.Ph.

<i>Company</i>	<i>Members</i>
Voting Cfgy: Y	Member Count: 1
e-Pocrafes	Marc Lawrence, M.D.
Voting Cfgy: Y	Member Count: 1
E-Script LLC	David Weinstein
Voting Cfgy: Y	Member Count: 1
E2M Health Services	Wesley E. Barnwell, III
Voting Cfgy: Y	Member Count: 1
Eagle Managed Care	Donald Amorosi
	Bill Wolfe
Voting Cfgy: G	Member Count: 2
Eckerd Corporation	Carol Cerney, R.Ph., MBA
	Jack Flynn
	David W. Linington
	Dianne Mason
	Lisa Spindler
Voting Cfgy: P	Member Count: 5
Eckerd Health Services, Inc.	Robed J. Kordella, R.Ph., M.B.A.
	Kelly K. Makay, R.Ph., MBA
	William O'Connor
	Edward Ober
	Aidan F. Tuite
Voting Cfgy: G	Member Count: 5
EDS	Sharon H. Greeson, R.Ph.
	George Pennebaker, Pharm.D.
	Patrick Robinson, R.Ph., MBA
	Margaret Weiker
Voting Cfgy: G	Member Count: 4
Elan Pharmaceuticals	Richard Lukasko, Pharm.D.
Voting Cfgy: P	Member Count: 1
Eli Lilly and Company	Renwick Crenshaw
	Julie A. Donovan
	Pamela K. Vaal
	Karen S. Wright

<i>Company</i>	<i>Members</i>
Voting Cfgy: P	Member Count: 4
Employee Health Insurance Management, inc.	Mindi Fynke
Voting Cfgy: G	Member Count: 1
ENVOY Corporation	Jay Baker
	Barry Becker
	Elaine Cherry
	Bad Davis
	Karen E. Galloway
	Lynne Gilbertson
	Jay Randolph
Voting Cfgy: Y	Member Count: 7
EPIC Pharmacy Network, Inc.	Patrick M. Berryman
Voting Cfgy: P	Member Count: 1
Excel/us Rx	John F. Giacobelli, MPA, R.Ph.
Voting Cfgy: G	Member Count: 1
Express Scripts, inc.	Stuart Bascomb
	Dale A. Chamberlain
	Laura Faller
	Julie Huppert
	Jason D. Jones, MBA
	Laurie Littlecreek
	Joyce E. McVey
	Richard E. O'Neal, R.Ph.
	Debbie K. Thompson
	Bob Ward
	Elizabeth S. Wingate
Voting Cfgy: G	Member Count: 11
Express-Med	Aaron M. Kanas, R.Ph.
Voting Cfgy: P	Member Count: 1
Facts and Comparisons	Donald Brower
	Rachel Palos, R.Ph.
Voting Cfgy: Y	Member Count: 2
FASACARD S.A.	Alejandro A. Roseblatt
Voting Cfgy: G	Member Count: 1

Company	Members
Ferring	Keith Perry
voting Ctg: P	Member Count: 1

FFI Health Services	Daniel E. Jadosh James J. Mindala Paul F. Wutz, R.Ph.
Voting Ctg: G	Member Count: 3

First DataBank	Thomas R Bizzaro, R.Ph. Marck DuBois David Manin Kay Morgan Steve Pickford James L. Wilson
Voting Ctg: Y	Member Count: 6

First Health Services Corporation	Andrea A. Bailey Timothy Bennette, CPA Richard J. Flage Timothy Gardner Jeanie Goodyear Dan Hardin, R.Ph. Page H. Pigg, Pharm.D. Donald Spatig, Don
Voting Ctg: G	Member Count: 8

Fletcher Spaght	Geeta Bahl
Voting Ctg: P	Member Count: 1

FLRx	Brian R. Shaw
Voting Ctg: G	Member Count: 1

FLRx (Excel/us)	Walter E. Semmel, III.
Voting Ctg: G	Member Count: 1

Flux Technology Solutions, Inc.	Thomas C. Corrigan, R.Ph.
Voting Ctg: Y	Member Count: 1

Foodarama Supermarkets, Inc.	Jeff Maltese, R.Ph.
Voting Ctg: P	Member Count: 1

Fred's Pharmacy	
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Company	Members
	Ricky A. Chambers, Pharm.D.
Voting Ctg: P	Member Count: 1

Freedom Drug Stores	Greg B. Ehrhardt
Voting Ctg: Y	Member Count: 1

Fujisawa Healthcare, Inc.	Pam Lawrence Michael A. Schultz, R.Ph. Sally Skyer Mary Jo Warfield
Voting Ctg: P	Member Count: 4

G.D. Searle	Andrew S. Kiss
Voting Ctg: P	Member Count: 1

G.D. Searle & Company	Kevin Slattery
Voting Ctg: P	Member Count: 1

Galderma Laboratories	Chuck Paschke
Voting Ctg: P	Member Count: 1

GEHA	Fonda Thompson
Voting Ctg: G	Member Count: 1

Genentech, Inc.	Linda L. Schock
Voting Ctg: P	Member Count: 1

General Prescription Programs, Inc.	R. Lee Friedman
Voting Ctg: G	Member Count: 1

Genetics Institute	Marla R. Brickley
Voting Ctg: P	Member Count: 1

Georgia Pharmacy Association	Charles P. Callihan, R.Ph.
Voting Ctg: Y	Member Count: 1

Giant Eagle, Inc.	Janice L. Meikle David A. Schuetz, R.Ph. Susan W. Solinski
voting Ctg: P	Member Count: 3

Giant Food, Inc.	
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Company	Members
	Gary J. Wirth, R.Ph., MBA
Voting Ctg: P	Member Count: 1
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Glades Pharmaceuticals	
	Carl Mamay
Voting Ctg: P	Member Count: 1
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Glaxo Wellcome, Inc.	
	David Brown
	Tonya M. Brown
	Robert C. Kademian, R.Ph.
	Amy A. Lamphier
	Robert Nauman
	Julie Swanson
	Clayton K. Whitehead, R. Ph.
	Jean Yarasheski-Reynolds
Voting Ctg: P	Member Count: 8
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Goold Health Systems, Inc.	
	Joseph Bruno, R.Ph.
Voting Ctg: G	Member Count: 1
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Graphic Technology, Inc.	
	Trey Beasley
Voting Ctg: Y	Member Count: 1
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Group Health Cooperative	
	Douglas W. Beeman
	Art Gurtel
	Roger Jeglum
Voting Ctg: G	Member Count: 3
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GSPO-Provider Services Corporation	
	Karen Scoullos, R.Ph.
Voting Ctg: G	Member Count: 1
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GTE Data Services	
	Steven Grimshaw
Voting Ctg: Y	Member Count: 1
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H-E-B Grocery Company	
	Jim Messa
Voting Ctg: P	Member Count: 1
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H.E. Butt Grocery Company	
	Millard A. Nance, R.Ph.
	Dennis Wiesner, R.Ph.
Voting Ctg: P	Member Count: 2
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Hannaford Bros. Co.	
	Dennis Beauchene, R.Ph., MBA

Company	Members
Voting Ctg: Y	Member Count: 1
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HCaliber Consulting Corporation	
	Ronald P. Jordan, R.Ph.
voting Ctg: Y	Member Count: 1
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Health Business Systems, Inc.	
	Nancy E. O'Neill
	Bruce Share
Voting Ctg: Y	Member Count: 2
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Health Care Finance Administration	
	Marilyn Abramovitz
Voting Ctg: Y	Member Count: 1
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Health Care Software, Inc.	
	Michael J. Kundla
Voting Ctg: Y	Member Count: 1
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Health Care Systems, Inc.	
	Sandy Bair
Voting Ctg: Y	Member Count: 1
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Health Integration Strategies	
	Robert J. Dudzinski, Pharm.D.
Voting Ctg: G	Member Count: 1
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Health Management Ventures, Inc.	
	Ann Lillie, R.R.A.
Voting Ctg: G	Member Count: 1
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Health Partners	
	Richard J. Bruzek, Pharm.D.
Voting Ctg: G	Member Count: 1
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Health Plan of the Redwoods	
	Lary Robbins, CphT
Voting Ctg: G	Member Count: 1
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Health Resources Publishing Co.	
	Robert A. Uecker
Voting Ctg: Y	Member Count: 1
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Health Resources, Inc.	
	David L. Dalton, D.Ph.
Voting Ctg: G	Member Count: 1
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Health Risk Solutions	
	Kathi Evans
Voting Ctg: Y	Member Count: 1
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Healthcare Computer Corporation	
	Larry Stephenson

Company	Members
	Teresa A. Strickland
Voting Ctg: Y	Member Count: 2
Healthcare Data Corporation	
	Robin Foote
	Darryl Percival, R.Ph.
voting Ctg: y	Member Count: 2
Healthcare Data Exchange	
	Mary Julia Street
Voting Ctg: y	Member Count: 1
Healthcare Delivery Systems, inc.	
	Robert H. Burge
	Steve Hoffman, R.Ph.
Voting Ctg: y	Member Count: 2
Healtheon	
	Henry Dai
voting cty: y	Member Count: 1
Healtheon/WebMD	
	Charles Brinkley
	James B. Haas, R. Ph.
	Sharon Hallberg
	Peter B. Harrison, MD
	Christopher Lagnese
	Tim Loerch
	Mike McManus
	Robert Meeker
	Nancy J. Nemes
	Wayne Palmore
	Jan Peck
	Timothy J. Tolan
	Carl H Winterich
Voting Ctg: Y	Member Count: 13
HealthPartners	
	Laura Topor
Voting Ctg: G	Member Count: 1
Healthplus of Michigan	
	Carolyn Germain, R.Ph.
Voting Ctg: G	Member Count: 1
HealthTrends.com	
	Delno Hall
Voting Ctg: Y	Member Count: 1
Heritage Information Systems, Inc.	
	John D. Tripodi

Company	Members
Voting Ctg: Y	Member Count: 1
HIP of Greater New York	
	Jay P. Kim, R.Ph.
Voting Ctg: G	Member Count: 1
Highmark Blue Cross Blue Shield	
	Patrick Kerrish, R.Ph., MBA
voting cty: G	Member Count: 1
HMN Health Services, Inc.	
	Harold Holzman
Voting Ctg: G	Member Count: 1
Hoechst Marion Roussel, Inc.	
	Lori Barouh
	Pete Joiner
	Robin Kroenke
voting Ctg: p	Member Count: 3
Hoffmann-La Roche, Inc.	
	Lorraine S Giermanski
Voting Ctg: P	Member Count: 1
Horton & Converse Pharmacies	
	Keith R. Lumpkin
voting Ctg: p	Member Count: 1
Hospital Health Plan Management Corp	
	Douglas Miller
Voting Ctg: G	Member Count: 1
Hughes Institute Oncology PA	
	Linda Eddy, R.Ph.
Voting Ctg: P	Member Count: 1
Humane Military Healthcare Services	
	Pamela M. Bell
Voting Ctg: G	Member Count: 1
I-many, Inc	
	Barry Hansen
	Sherri A. Tripp
	Glenn J. Wira
Voting Ctg: Y	Member Count: 3
CSYS Technologies, Inc.	
	H. Ronald McClellan, R.Ph.
voting Ctg: Y	Member Count: 1
IDX Systems Corporation	
	Gregory Aldridge, M.S. R.Ph.

Company	Members
Voting Ctgty: Y	Member Count: 1
Illinois Department of Public Aid	
	Michael D Hennessey
Voting Ctgty: G	Member Count: 1
Immediate Pharmacy Services	
	Robert E. Marks, R.Ph.
Voting Ctgty: G	Member Count: 1
IMS HEALTH	
	Mark Ashby
	John Creidler
	Tim Delehanty
	Deborah M. Drake
	Marti S. Egger
	Diane Ellmore
	Bonnie Engel-Cornett
	Robert P. Hartman
	Robert Hunkler
	Jim Hunter
	Douglas M. Long
	William Maximuck
	Zoltan Melczer
	Robed P. Mueting, Pharm D.
	Pam L. Sauerwald
	Jack Tuttle
Voting Ctgty: Y	Member Count: 16
Independence Blue Cross	
	Mary Elder
Voting Ctgty: G	Member Count: 1
Independent Health Association, Inc.	
	Mark N. Brueckl, R.Ph., M.B.A.
Voting Ctgty: G	Member Count: 1
Independent Pharmaceutical Consultants, Inc.	
	Kenneth W. Anderson, R.Ph.
Voting Ctgty: Y	Member Count: 1
Infinite Data Structures, Inc.	
	Alexander Onoshko
	David Weiss
Voting Ctgty: Y	Member Count: 2
Infinity Towers, Inc.	
	James L. Moody
voting Ctgty: Y	Member Count: 1
INFORET	

Company	Members
	Frank Rubin, R.Ph.
Voting Ctgty: Y	Member Count: 1
Infowerks Data Services	
	Jeff Deitch
Voting Ctgty: Y	Member Count: 1
Innovative Health Strategies, Inc.	
	Terri Bernacchi, R.Ph. MBA
	Paul Dausman
Voting Ctgty: Y	Member Count: 2
Integrated Pharmaceutical Services	
	Mark Elliott
	Edward J. Hanson, R.Ph.
	Jack McClurg
Voting Ctgty: G	Member Count: 3
Interactive Systems & Management, Inc.	
	Salvatore S. Giunta
	Alexander J. Phillips
Voting Ctgty: Y	Member Count: 2
InterCanvas Designs	
	Ramon Redondo
Voting Ctgty: Y	Member Count: 1
Interchange PMP	
	David Holladay
	Mark Lewandowski, Ph.D.
Voting Ctgty: G	Member Count: 2
International Pharmacy Management, Inc.	
	Nick Black
Voting Ctgty: G	Member Count: 1
Intervoice, Inc.	
	Tom Dickson
Voting Ctgty: Y	Member Count: 1
IPC, Inc.	
	Dean Anderson, MBA, PHR
Voting Ctgty: G	Member Count: 1
IPS	
	Michael Baca
	Larry L. Innocent
	Bijan Sarrafzadeh
Voting Ctgty: G	Member Count: 3
iScribe	
	Bryan Holloway

Company	Members
	Shane Wiley
voting ctgy: Y	Member Count: 2
<hr/>	
iScribe, Inc.	
	Sherry L. Neuman, Pharm.D.
voting ctgy: Y	Member Count: 1
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Janssen Pharmaceutica	
	Kurtis J. Barry, R.Ph.
Voting Ctgy: P	Member Count: 1
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JDA Electronic Information Inc.	
	James Dudley
Voting Ctgy: Y	Member Count: 1
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Johnson & Johnson	
	Glen Hock
Voting Ctgy: P	Member Count: 1
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Johnson & Johnson Health Care Systems, Inc.	
	Carol R. Norris
Voting Ctgy: P	Member Count: 1
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K2 Consultants, Inc.	
	Sandeep Shah
Voting Ctgy: Y	Member Count: 1
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Kaiser Permanente	
	Glenn Hamamoto
	Debbie A. Kennedy, MPA
	Linda K. Yamada, Pharm.D.
Voting Ctgy: G	Member Count: 3
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Kansas Dept. of Social & Rehab Services	
	Karen Braman
Voting Ctgy: G	Member Count: 1
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Keane, Inc.	
	Jim Bilsky
Voting Ctgy: Y	Member Count: 1
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Keystone Mercy Health Plan	
	Rudy Martin
Voting Ctgy: G	Member Count: 1
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Kinetra, LLC	
	Russel Lee
	Bill Wehinger
	Steve Whitehead
Voting Ctgy: Y	Member Count: 3
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King Soopers, Inc.	
	Janine Roeding

Company	Members
Voting Ctgy: P	Member Count: 1
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Kinney Drugs, Inc.	
	Owen W. Halloran, R.Ph.
Voting Ctgy: P	Member Count: 1
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Kmart AmeriKind Pharmacy Network	
	Louis H. Cutcliffe, R.Ph.
	James A. Green, R.Ph.
Voting Ctgy: G	Member Count: 2
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Kmart Corporation	
	Cindy Brenner
	Mark Chamness
	David King
	Raymond McIntire, R.Ph.
	Catherine Polley, R.Ph.
Voting Ctgy: P	Member Count: 5
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Knoll Pharmaceutical Company	
	Jim Slevin
Voting Ctgy: P	Member Count: 1
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Konsult Data Systems	
	Larry Crots, R.Ph.
Voting Ctgy: G	Member Count: 1
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KPMG LLP	
	Karen Harper
Voting Ctgy: Y	Member Count: 1
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KPMG Peat Marwick, L.L.P.	
	Paulette O'Connell
Voting Ctgy: Y	Member Count: 1
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L.A. Care Health Plan	
	Paul G. Prine, R.Ph.
Voting Ctgy: G	Member Count: 1
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Law Office of William P. McCormick	
	William P. McCormick, JD, R.Ph.
Voting Ctgy: Y	Member Count: 1
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LEGEND PHARMACIES	
	Dawn Byrd
Voting Ctgy: P	Member Count: 1
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Lewis Drug, inc.	
	David Nielsen
Voting Ctgy: P	Member Count: 1
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Lexicom Computer Systems	
	Herman Roehm, R.Ph.

Company Members

Voting Ctg: Y Member Count: 1

Lexmark international

Jeff Beard

Voting Ctg: Y Member Count: 1

LogonHealth Corporation

Raj Agarwal

Voting Ctg: Y Member Count: 1

Longs Drug Stores, Inc.

Dale Bystrom, R.Ph.

Lisa M. Cueto

Walter Dere

Robert R. Hansen, Pharm.D.

Joseph Kratz, III

Rhonda Oswald

Jeffrey E. Rinda

Voting Ctg: P Member Count: 7

M-Plan

Susan L. Fisher, R.Ph.

Voting Ctg: G Member Count: 1

Managed Information Solutions, Inc.

Jason M. Longerbone

Voting Ctg: Y Member Count: 1

Managed Pharmacy Benefits, Inc.

Will Beaty

Hugh Mugfor

Voting Ctg: G Member Count: 2

Marc Glassman, Inc.

David Florman, R.Ph.

Voting Ctg: P Member Count: 1

Martin Drugs, Inc.

Nancy McCormick, CPht

Voting Ctg: Y Member Count: 1

Maxor National Pharmacies

Eddie D. Clement, MBA

Voting Ctg: G Member Count: 1

Maxor Plus

Bret W. Hightower

Terry L. Payne

Steve Smith, R.Ph.

Voting Ctg: G Member Count: 3

Maxorplus**Company Members**

Kevin D. Roberts

Voting Ctg: G Member Count: 1

MCC

Joseph P. Duane, R.Ph.

Voting Ctg: Y Member Count: 1

McKesson HBOC, inc.

Valerie Arinsberg

James R. Ayers, R.Ph.

John Brennecke, R.Ph.

Richard Matthew, R.Ph.

Charles C. Meyer

Linda K. Woodall, R.Ph.

Voting Ctg: Y Member Count: 6

McKesson Pharmacy Systems

Mark M. Sancrainte, R.Ph., MBA

Voting Ctg: Y Member Count: 1

MCS, Inc.

Judy Harrison

Voting Ctg: Y Member Count: 1

med-i-nets.com

Glenn Jones

Voting Ctg: Y Member Count: 1

Medadvisor, Inc.

Annette Cunningham

Norrie Thomas, Ph.D.

Kirsten Tiberg, R.Ph.

Voting Ctg: Y Member Count: 3

MedCompanion, Inc.

Mikhail Elias

Voting Ctg: Y Member Count: 1

MedData Inc.

David Turcaso

Voting Ctg: Y Member Count: 1

Medi Media USA, Inc.

Sheryl Lowenhar, R.Ph.MBA

Voting Ctg: Y Member Count: 1

Medi-Mail, Inc.

Karen Curtis

Kyle L. Tingle

Michael Ward

Voting Ctg: P Member Count: 3

Company Members

Medic Pharmacy Inc.

Clovis S. Burch, R.Ph.

Voting Ctg: P **Member Count:** 1

Medical Economics

Mukesh Mehta, R.Ph.

Voting Ctg: Y **Member Count:** 1

Medical Marketing Service, Inc.

Richard Elliott

Voting Ctg: Y **Member Count:** 1

Medical Matrix, Inc.

Cynthia S. Headlee, R.Ph.

Tammy Luker

Matthew D. Melson

Kimberly Roselle

Voting Ctg: G **Member Count:** 4

Medical Security Card Co.

Marc A. Bralts

Voting Ctg: G **Member Count:** 1

MedicaLogic

Pat Wolfram

Voting Ctg: Y **Member Count:** 1

Medicap Pharmacies, inc.

Stephen C. Mullenix, R.Ph.

Voting Ctg: P **Member Count:** 1

Medicine Shoppe International, Inc.

Kathy Bradford

Alan Chazen

Robert W. Collins, R. Ph.

Gary M. Levine, R.Ph.

David Ritchey

Voting Ctg: P **Member Count:** 5

Medifor, Inc.

Ken Barnett

Voting Ctg: G **Member Count:** 1

MediKredit Ltd.

Alouise Adlam

Voting Ctg: G **Member Count:** 1

Medtimpact Healthcare Systems, Inc.

Elizabeth Esparza

Bill Francis

Greg Gehrich

Stanley Hutchinson

Company Members

Gracy Ibarra

Daniel Lau

Janeen McBride

Daniel R. Ramirez, Pharm. D.

Voting Ctg: G **Member Count:** 8

Mediware Information Systems

Terence M. Meehan, R.Ph

Voting Ctg: Y **Member Count:** 1

Meijer, Inc.

Dave Aniszko

Patrick Gavin, R.Ph.

Randall T. Hanna, R.Ph.

Kevin Hum, R.Ph.

William Overkamp, R.Ph.

Voting Ctg: P **Member Count:** 5

MemberHealth, Inc.

Charles E. Hallberg, Esq.

Scott G. Hughes, R.Ph.

Voting Ctg: G **Member Count:** 2

Merck & Co., Inc.

Theresa Carroll

Bret W. Orpin

Voting Ctg: P **Member Count:** 2

Merck-Medco Managed Care, L.L.C.

Craig S. Bentley

Agnes Brady

Michael Doyle

Thomas L. Duke, R.Ph.

Nora P. Estrella

Arnaldo Freda, R.Ph.

Elliott A. Frome

Annette Gabel

Steve Goldberg

Cynthia A. Horn

Hugh Johnston

Robert T. Muller

Michele Nesbital

Cynthia J. O'Neill

Sandra Peterson

Mary J. Ryan, R.Ph.

Anthony Schueth

Amir Segev

John L. Sisto, R.Ph.

Rafael Sosa

Company	Members
	Howard M Sragow G. William Strein, R.Ph. Coleen Sullivan Voting Ctg: G Member Count: 23
Mercy Health Plans	Michael Murphy Voting Ctg: G Member Count: 1
Michigan Bankard Services	Nancy J. Vance Voting Ctg: Y Member Count: 1
Michigan Department of Community Health	Sandra J. Kramer Voting Ctg: G Member Count: 1
MicroAge Teleservices	Phillip D. Scott Voting Ctg: Y Member Count: 1
Micromedex, Inc.	Andrew Bowman Karen Eckert, R.Ph. James A. Hickerson Robert Mandernack, R.Ph. Lauri Moore Michael Moore Tim Z. Murray Voting Ctg: Y Member Count: 7
Midwestern University	Hisham Mahrous, Ph.D. Michael T. Rupp, Ph.D. R.Ph. Voting Ctg: Y Member Count: 2
MIM Health Plans, Inc.	Regie B. Bomar Phonzie W. Brown, D.Ph. Russel J. Corvese Paul Larrat Rita Marcoux, R.Ph. Karen G. Mariano, R.Ph. Timothy A. Ogurek, R.Ph. Voting Ctg: G Member Count: 7
Molina Medical Centers	Carolyn Nguyen Voting Ctg: G Member Count: 1
Monument Systems	

Company	Members
	Cindy A. Post Voting Ctg: Y Member Count: 1
Moon Communications	Daryl Holt Voting Ctg: Y Member Count: 1
Moore North America	Tom Eddington Voting Ctg: Y Member Count: 1
MPSS-Mail Order Prescription Service	Louis Kohl, R.Ph. Voting Ctg: P Member Count: 1
MRI Sales Consultants - Baton Rouge	Gregory Fell, MBA Voting Ctg: Y Member Count: 1
MultiMedica, Inc.	Thomas Marks Voting Ctg: Y Member Count: 1
Multum Information Services, inc.	Brian Levy, MD Timothy McNamara, MD, MPH Terri Meredith, R.Ph. Voting Ctg: Y Member Count: 3
Muro Pharmaceutical, Inc.	Stephanie A. Livingston Richard L. Marden, R.Ph. Voting Ctg: P Member Count: 2
National Association of Boards of Pharmacy	Carmen A. Catizone Voting Ctg: Y Member Count: 1
National Association of Chain Drug Stores	Roy J. Bussewitz, R.Ph., J.D. Voting Ctg: Y Member Count: 1
National Community Pharmacists Association	Kenneth Whittemore, Jr., R.Ph., MBA Voting Ctg: Y Member Count: 1
National Data Corporation	Charles Barnett Voting Ctg: Y Member Count: 1
National Med. Hlth Card Systems, Inc.	Blaine S. Atkins

Company Members

Voting Ctg: G Member Count: 1

National Medical Health Card Systems, Inc.

Kenneth Hammond, R. Ph.
Elaine Levy
Sonia Mann
Linda Portney

Voting Ctg: G Member Count: 4

National Prescription Administrators, Inc.

W. Paul DeBree, R.Ph.
Peter Grieger
Richard O. Ullman, R.Ph.

Voting Ctg: G Member Count: 3

National Respiratory Services, LLC

Johnny L. Perry

Voting Ctg: P Member Count: 1

NCS Healthcare

Barbara Reed, R.Ph.

Voting Ctg: P Member Count: 1

NDC Health information Services

Laurie Amodio
Tim Blanchard
Richard Bloom, R.Ph.
Suzanne Coffman, R.Ph.
John Collins
Craig L. Ford
Michael A. Galluzzo
Donna Gizbert, R.Ph.
Anna Gonzales
J. Stephen Groover, R.Ph.
Ginny Jordan
Clark Kucharski
Carol Livingston
Kevin N. Nicholson, R.Ph., J.D.
Curtis D. Orr
Patrick Pannier
Jayne P. Pascarelli
Valerie Pauli
Roger Pinsonneault, R.Ph.
Errol D. Rafal
Joseph Rector
Craig Santilli
Sharyn Seitz, MBA, CMA
Craig Smith
Linda A. Sodi

Company Members

Anthony S. Stewart
Deborah L. Stroup
Bob Tennyson
Christina Waldron
Michael D. Weintraub, R.Ph.

Voting Ctg: Y Member Count: 30

NeighborCare

Tim Wagner

Voting Ctg: P Member Count: 1

New Tech Computer Systems

Willard Edwards

Voting Ctg: Y Member Count: 1

New York State of Dept. of Health

Julie Naglieri

Voting Ctg: G Member Count: 1

North American Computer

Jim Springer, Sr.

Voting Ctg: Y Member Count: 1

Northeast Pharmacy Service Corp.

David Benoit

Voting Ctg: P Member Count: 1

Northwest Pharmacy Services

Joseph Fazio, MHA, R.Ph.
Norman G. Reitz, R.Ph.

Voting Ctg: G Member Count: 2

Nova Prescription Services, Inc.

Jon Berkley, R.Ph.
Steven M. Treff
Dianne S. Warneke

Voting Ctg: G Member Count: 3

Novo Nordisk Pharmaceuticals, Inc.

Stephen B. McGill
Brenda Mulligan
Joanne L. Sadowsky

Voting Ctg: P Member Count: 3

Omega Systems, Inc.

David Wiener

Voting Ctg: Y Member Count: 1

Omnicare, Inc.

Gary W. Kadlec, R.Ph., MBA
Joseph M. Klare

Company	Members
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Voting Ctg: Y Member Count: 2

OmniSYS, Inc.

Todd Airhart

Jerry J. Ransom, Ph.D.

Voting Ctg: Y Member Count: 2

On-Line Transaction Consultants

Geoff Strickler

Voting Ctg: Y Member Count: 1

OnCall Healthcare Communications

Brad L. Schwartz, M.D.

Voting Ctg: Y Member Count: 1

One Call Comprehensive Care

Michael K. McQuilken, Pharm.D.

Voting Ctg: Y Member Count: 1

Organon Inc.

Sean Gallagher

Voting Ctg: P Member Count: 1

Ortho Biotech, Inc.

John Dempsey

Rich O'Leary

Voting Ctg: Y Member Count: 2

Ortho-McNeil Pharmaceutical

Brian D. Bastean, Pharm.D

Voting Ctg: P Member Count: 1

PA Office of Attorney General

John McGuire

Voting Ctg: G Member Count: 1

Pacific Pharmacy Computers, inc.

Thorn Wilcox

Voting Ctg: Y Member Count: 1

Pacificare Health Systems

Robert A. Hiatt, Pharm.D.

Voting Ctg: G Member Count: 1

PacifiCare of Arizona, inc.

Kenneth J. Bykowski, M.S.

Voting Ctg: G Member Count: 1

PAID Prescriptions, L. L.C.

Nicholas Barone

Arthur Dawson

Georgia Eddleman

Dante Ibanez

Company	Members
----------------	----------------

Andrew R. Johnson, R.Ph.

Frances Mahon

Lydia Potter

Voting Ctg: G Member Count: 7

Paper Free Systems, Inc.

Daniel Kalzaz

Voting Ctg: Y Member Count: 1

Perk Stone Medical Info. Systems, inc.

Shawn C. Michael

Lewis Stone

Voting Ctg: Y Member Count: 2

Parke-Davis

Timothy L. Alexander

Gene Daino

Michael Frost

Neil Laden

Dirk Ruppert

Voting Ctg: P Member Count: 5

Pathmark Stores, Inc.

John R. Ferrara, R.Ph.

Voting Ctg: P Member Count: 1

PBM Argentina SA

Ernesto A. Besada

Voting Ctg: G Member Count: 1

PCS Health Systems

Betty Barnes

Shannon Degrazia

Eric S. Elliott

Erma Francis

Jeanette Lau, Pharm.D.

Damon R. Tressler

Voting Ctg: G Member Count: 6

PCS Health Systems, Inc.

Maureen Brown, R.Ph.

Trish Brown

Tom Burbeck

Brian J. Correia, CFE

Melanie DeLapp

Simon Eisenberg

Cheryl Emerson

Richard Felix

Tom Gibbons, R.Ph.

Todd Guinn

Company	Members
	Rachel Johnson John Lavin, MBA, MPH Heidi Levendusky Lisa Lindsey Marlene Lo Tempio-Potter Kevin J. Murphy, MBA Sharon A. Nabors Daniel Pagnillo Daniel Parrish Lisa Schuldes Patrick Smith, R.Ph. Doug Stephens, R.Ph. Lowell T. Sterler, R.Ph. MBA Lorraine Stevens, R.Ph. Shannon Struble Katherine L. Stuart Erin Tesch Laura M. Tomes Mark W. Ward K. Mark Wormes, R.Ph.
Voting Ctg: G	Member Count: 30
PD-Rx Pharmaceuticals, Inc.	Jack McCall
Voting Ctg: G	Member Count: 1
PDX/NHIN	Karen Guinan Ken Hill, R.Ph.
Voting Ctg: Y	Member Count: 2
Pequot Pharmaceutical Network	John F. Aforismo Fred J. Calatayud Joseph Lidestri, Jr.
Voting Ctg: G	Member Count: 3
Performance Engineering Corp.	Thomas Casey
Voting Ctg: Y	Member Count: 1
Pfizer, Inc.	Kurt DeGroot
Voting Ctg: P	Member Count: 1
Phar-Mor, inc.	Bruce A. Anderson Mark Doerr, R.Ph. David Hudach

Company	Members
	Melenie Petropoulos, R.Ph. Robert Sarvas, R.Ph.
Voting Ctg: P	Member Count: 5
Pharm/alert	Janet Goodman
Voting Ctg: Y	Member Count: 1
PharmaCare	William J. Derrig, III Richard Dobrofsky David Pelkey Donna M. Peyton
Voting Ctg: G	Member Count: 4
Pharmaceutical Care Associates, Inc.	Barry M. Krelitz, R.Ph.
Voting Ctg: G	Member Count: 1
Pharmaceutical Care Management Assoc.	Delbert D. Konnor, PharmMS
Voting Ctg: Y	Member Count: 1
Pharmaceutical Care Network	William R. Nygard Matthew J. Simas John T. Skhal, Pharm.D.
Voting Ctg: G	Member Count: 3
Pharmaceutical Care Outcomes, Inc.	Michael J. Frakes, Pharm.D.
Voting Ctg: Y	Member Count: 1
Pharmaceutical Corporation of America	Mason Goodman, M.D.
Voting Ctg: P	Member Count: 1
Pharmaceutical Technologies, Inc.	Eric R Schram Melissa Schreifels, R.Ph.
Voting Ctg: G	Member Count: 2
Pharmacia & Upjohn	Yolanda Lorenc
Voting Ctg: P	Member Count: 1
Pharmacy Advantage System	Dondi W. Ballard, R.Ph.
Voting Ctg: G	Member Count: 1
Pharmacy Associates, Inc.	Alan K. Gardner

Company Members**Voting Ctgy: G Member Count: 1**

Pharmacy Benefit Administrator, Inc.

Emilio Ruiz

Voting Ctgy: G Member Count: 1

Pharmacy Business Associates

Monty Rogers, R.Ph., FASCP

Voting Ctgy: G Member Count: 1

Pharmacy Data Management, Inc.

Thomas Kear

Douglas A. Wittenauer, R.Ph.

Voting Ctgy: G Member Count: 2

Pharmacy Healthcare Solutions, Inc.

Donald J. Dietz, R.Ph.

Timothy E. Kosty, R.Ph.

Voting Ctgy: Y Member Count: 2

Pharmacy Outcomes Specialists

Susan Peard

Voting Ctgy: Y Member Count: 1

Pharmacy Providers of Oklahoma

Lonny D. Wilson, R.Ph.

Voting Ctgy: G Member Count: 1

Pharmasmarket.com

Mark E. Schlesinger

Voting Ctgy: Y Member Count: 1

PharmaSure, Inc.

David C. Bellin

Melissa N. Fanning

John Garner

Voting Ctgy: Y Member Count: 3

PharmlInfo, Inc.

Henry Shao

Voting Ctgy: Y Member Count: 1

Pharmpak, Inc.

Mark Horne

Voting Ctgy: Y Member Count: 1

planetRx.com

Jon Black

Kirk Huffaker, R.Ph.

Ken Noonan

Kenneth B. Scott, R.Ph.

Company Members**Voting Ctgy: P Member Count: 4**

PMH Health Resources, Inc.

JoAnn Roberts

Voting Ctgy: G Member Count: 1

PMR Corporation

Richard Bruce

Voting Ctgy: Y Member Count: 1

PocketScript, Inc.

Michael Aldridge

Voting Ctgy: Y Member Count: 1

Pointshare Corporation

Dennis Schmuland, MD

Voting Ctgy: Y Member Count: 1

PPS Medical Marketing Group, inc.

Margaret Pentaleri

Voting Ctgy: Y Member Count: 1

Premier Pharmacy Plan

Harold D. Leatherman, CLU

Voting Ctgy: G Member Count: 1

Prescription Solutions

Marnie Anton-Martinez

Ed Feaver, Pharm.D.

John Gotthard

Catherine Johnson

Vance Little

Teresa Morelock

Ching-Pyng Shiang

Sophie Tong-Chung, Pharm.D.

Robin Zeal

Voting Ctgy: G Member Count: 9

prescriptionsnet.com

Mohana R. Velagapudi, M.D.

Voting Ctgy: Y Member Count: 1

Price Waterhouse Coopers LLP

David Wysocky

Voting Ctgy: Y Member Count: 1

Prime Therapeutics, Inc.

Doug Ableidinger

Lisa DeVries, R.Ph.

David Ellis

Piper Garmon

Company	Members
	George Hall
	Jolene Hunter
	Gregory Kaupp
	Susan Koppi
	Robert Koziol
	Shannon Leske
	Gary A. Loeber, R.Ph.
	Scott Lynch
	Steve Martin
	Mary Mead
	Jill Nelson
	Edmond K. O'Reilly
	Frank Safinia
	Teresa Storm
	Alan L. Van Amber, R.Ph.
	Richard Waltermire

Voting Ctg: G Member Count: 20

PrimeMed Pharmacy Services, Inc.

Dan Rombro

Voting Ctg: Y Member Count: 1

PrimeMedRx.com

Jerry Cazzell

Voting Ctg: Y Member Count: 1

Printing For Systems, Inc.

Michael J. Mayhall

Christopher W. Rotermund

Scott Rotermund

Sean Rotermund

Voting Ctg: Y Member Count: 4

ProCare Rx

Kara Hatch-Eads

Barbara Shockley

Voting Ctg: Y Member Count: 2

Procter & Gamble Company

Ronald M. Brandt

Jeff Merrifield

Judith A. Porges

Rita A. Zerhusen

Voting Ctg: P Member Count: 4

Prodigy Data Systems, Inc.

Kenneth H. Fitchett

Voting Ctg: Y Member Count: 1

ProMedex Inc.

Company	Members
	Pieter Muntendam

Voting Ctg: G Member Count: 1

Prospective Health, Inc.

David D'Altorio, Pharm.D.

Shelley Grant

Joseph M. Gregar

Michael Gremillion

Dawn Jackson

Brian Pavlik

William D. Turner, R.Ph.

Jim Webster

Keith Zalewski

Voting Ctg: Y Member Count: 9

ProVantage PBM Services

Paul G. Krikelas

Don Nagy

Gerald Novak, R.Ph.

James Zirpoli, R.Ph.

Voting Ctg: G Member Count: 4

Provena Senior Services

Sue Francoeur

Voting Ctg: P Member Count: 1

ProxyMed, inc.

Richard Brook

Philip Giordano, R.Ph.

Jack Guinan

Voting Ctg: Y Member Count: 3

Prudent Rx, Inc.

Russell L. Dates

Ronald Harrison

Voting Ctg: Y Member Count: 2

Prudential Healthcare Pharmacy Services

Pamela Durham, R.Ph.

Voting Ctg: G Member Count: 1

PRxN Pequot Pharmaceutical Network

Larry D. Holder

Voting Ctg: G Member Count: 1

Public Consulting Group, Inc.

Fran Coury

Voting Ctg: Y Member Count: 1

Publix Super Markets, Inc.

Richard W. Gourash, R.Ph., MBA

Company	Members
	Bob Greenwood Perry Lewis Ronald C. Miller Voting Ctgy: P Member Count: 4
QS/1 Data Systems	Rita Ayers Linda M. Campbell Barry Jarnigan Voting Ctgy: Y Member Count: 3
Quality Care Solutions, Inc.	J. Mikel Echeverria Voting Ctgy: Y Member Count: 1
Quick Rx Drugs, Inc./AIP	Ron Stephens Voting Ctgy: P Member Count: 1
R&R Electronics	Ricardo Perez Voting Ctgy: Y Member Count: 1
R/Xx Pharmacy Solutions Inc.	Kenneth J. Diamond, Ph.D. Voting Ctgy: G Member Count: 1
Raley's	Flint A. Pendergraft, Pharm.D. Voting Ctgy: P Member Count: 1
Randall's Food & Drug, Inc.	David E. King, R.Ph. Voting Ctgy: P Member Count: 1
Rapid Rx, Inc.	Kenneth Minor, R.Ph. Voting Ctgy: Y Member Count: 1
Receptive Technologies, Inc.	Janos Redei, MD, PhD Voting Ctgy: Y Member Count: 1
Regenc Blue Shield	Linda Sturm Voting Ctgy: G Member Count: 1
Regent Drugs of New Mexico, Inc.	Robert Ghattas, R.Ph. Voting Ctgy: G Member Count: 1
Renlar Systems, Inc.	Bernard Knutsen

Company	Members
	Michael Roberts Voting Ctgy: Y Member Count: 2
Rescot Systems Group, Inc.	Thomas J. Weiss Voting Ctgy: Y Member Count: 1
Resolve Consulting, inc.	Robert W. Field Voting Ctgy: Y Member Count: 1
Resource Information Management Systems, Inc.	Terry Patrick Voting Ctgy: Y Member Count: 1
RESTAT	John P. Bergan Michael W. Clark David R. Kwasny Jo Mischker Voting Ctgy: G Member Count: 4
Retired Persons Services, Inc.	Terri Bostick, R.Ph., MBA Heather Hudson Marjorie K. Simos, R.Ph. Ed D. Spearbeck, R.Ph. Voting Ctgy: P Member Count: 4
Rhone-Poulenc Rorer Pharmaceuticals, Inc.	Thomas Baker Cecilia Cochran Bryan DiMaio, CPA, MBA Deana Griffith Patrick J. Zazzarino Voting Ctgy: P Member Count: 5
Rite Aid Corporation	Robert A. Burkett Paul B. Chace, R.Ph. Cheryl Marshall Douglas Mitchell Joyce Replogle W. Douglas Riden James Sullivan Voting Ctgy: P Member Count: 7
RNA Health Information Systems	Gary J. Schoettmer Voting Ctgy: Y Member Count: 1

Company	Members
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Robinson Drug Co., Inc.

Bernard A. Altman

Voting Ctgy: P **Member Count:** 1

Roche Laboratories, Inc.

Lori Matrale

Voting Ctgy: P **Member Count:** 1

Rocky Mountain Technology Group, Inc.

Doug McIsaac

Voting Ctgy: Y **Member Count:** 1

Roxane Laboratories, Inc.

John R. Powers

Voting Ctgy: P **Member Count:** 1

RPK Pharmaceuticals Inc.

Peter Forni, Pharm.D.

Voting Ctgy: P **Member Count:** 1

RPX/U.F.C. W. Midwest Benefits Fund

Janice Robin, R.Ph., CEBS

Voting Ctgy: Y **Member Count:** 1

RX Canada, Inc.

Kevin B. West

Voting Ctgy: G **Member Count:** 1

Rx Direct, Inc.

Dana Champine

Jim W. Slaton

Voting Ctgy: G **Member Count:** 2

Rx Innovations

John Gardynik

Louis J. Stanislaio

Voting Ctgy: G **Member Count:** 2

Rx Pride

Gary Ellis

Voting Ctgy: G **Member Count:** 1

Rx Village, Inc.

Ravi Reddy

Voting Ctgy: Y **Member Count:** 1

Rx.com, Inc.

Cathy Steward, R. Ph.

Voting Ctgy: Y **Member Count:** 1

RxAmerica

Joseph LaPine, R.Ph.

Steffenie Peterson

Company	Members
----------------	----------------

Voting Ctgy: G **Member Count:** 2

S2 Systems, inc.

Rick W. Walters

Voting Ctgy: Y **Member Count:** 1

Safeway Food and Drug

Kevin McCarthy, R.Ph.

Voting Ctgy: P **Member Count:** 1

Safeway Inc.

Marcy Heap

David A. Valerio, J.D.

Voting Ctgy: P **Member Count:** 2

Sales Consultants of Baton Rouge

Steve Winkler

Voting Ctgy: Y **Member Count:** 1

Samedaypharmacy.com

Vahan Aladadi, R.Ph.

Voting Ctgy: Y **Member Count:** 1

San Diego Pharmacy Alliance

Leslie A. Smith

Voting Ctgy: Y **Member Count:** 1

SAV-MOR Drug Stores

Yvonne Gallagher

Richard Grossman

Voting Ctgy: P **Member Count:** 2

Save Mart Supermarkets

Marilee Rose

Phil Smith, R.Ph.

Michele Snider, Pharm.D.

Voting Ctgy: P **Member Count:** 3

SBPA Systems, Inc.

Krystal Kainer

Voting Ctgy: Y **Member Count:** 1

Schering-Plough Corporation

Dennis Noonan

Serafina Oxner

Robert G. Scheibling

Voting Ctgy: P **Member Count:** 3

Schnuck Markets, Inc.

James Cordes

Voting Ctgy: P **Member Count:** 1

Scientific Retail Systems, Inc.

Company	Members	Company	Members
	Fredrick W. Barber -----	Voting Ctgy: P	Member Count: 1
Voting Ctgy: Y	Member Count: 1		
Script Cars, Inc.		Sidmak Laboratories, Inc.	
Jim Brown, R.Ph.		Satish P. Patel, Ph.D.	
Voting Ctgy: G	Member Count: 1	Voting Ctgy: Y	Member Count: 1
Script On-Line		Sierra Health Services	
John Romano, R.Ph.		Anthony Banks	
Voting Ctgy: y	Member Count: 1	Voting Ctgy: G	Member Count: 1
Script World, Inc.		Sigma-Tau Pharmaceuticals, fnc.	
Larry Madsen, R.Ph.		Jay Humphrey	
Voting Ctgy: G	Member Count: 1	voting Ctgy: P	Member Count: 1
Scriptfill		SLM Software Inc.	
Joe Lacy, M.D.		Nafeeza Baksh	
Voting Ctgy: Y	Member Count: 1	voting Ctgy: Y	Member Count: 1
ScriptLINE		SmithKline Beecham Pharmaceuticals	
Margeret M. Schindhelm		Anne Cotmtsios	
Voting Ctgy: G	Member Count: 1	Susan McAveney	
Searle		Susan O'Connell	
Kevin E. McKinney		Stan Swigoda	
Voting Ctgy: P	Member Count: 1	Voting ctgy: P	Member Count: 4
Seprawr, Inc.		Southern Pharmacy Benefits	
Annmarie Ahumada		Jim Cahoon, R.Ph.	
Voting Ctgy: p	Member Count: 1	Voting Ctgy: G	Member Count: 1
Serono Laboratories, Inc.		Spirit of Women	
Jeff Hart		Leigh Adamson, MBA	
Kathleen Ogar		Voting Ctgy: Y	Member Count: 1
Heriberto Parra		SSI Custom Data Cards	
Voting Ctgy: P	Member Count: 3	Ron Goade	
Serv-U Prescription Services		Voting Ctgy: Y	Member Count: 1
Lester S. Komarowski, Jr.		Stadtlanders Managed Pharmacy Services	
Sharon Murillo		Don Dindak	
Voting Ctgy: G	Member Count: 2	Chronis H. Manolis, R.Ph.	
SHA Management Corporation		Voting Ctgy: G	Member Count: 2
Brian W. Slusser		Standard Register Company	
Voting Ctgy: P	Member Count: 1	Harvey S. Klein, LNHA	
Shopko Stores, Inc.		Voting Ctgy: Y	Member Count: 1
Catherine M. Vander Zanden		Standard Technology, Inc.	
Voting Ctgy: P	Member Count: 1	Lisa M. Tompkins	
Shoppers Drug Mart		Voting Ctgy: Y	Member Count: 1
Jacqueline B. Stroud, R.Ph.		State of North Dakota	
		Rick Detwiller, R.Ph.	

Company Members

voting Ctg: Y Member Count: 1

The Inteq Group, Inc.

Patti Carr, R.Ph.
Andrew P. Fisk
Everett E. Robinson, IV
John Teichgraeber

Voting Ctg: G Member Count: 4

The Kroger Company

Roger A. Fogle

Voting Ctg: P Member Count: 1

The MEDSTAT Group

Nigel McGugan

Voting Ctg: Y Member Count: 1

The Opus-Core Corporation

Harvey Brofman
Lou Sassano

voting Ctg: Y Member Count: 2

The Potomic Group- Apollo/ComCoTec.

Craig Eilermann

Voting Ctg: Y Member Count: 1

The U.S. Pharmacopeial Convention, Inc.

Mark Sohaskv

Voting Ctg: Y Member Count: 1

theBigRX.com

Richard Jay, Pharm.D.

Voting Ctg: Y Member Count: 1

Third Party Solutions, LLC.

Doug Radant, R.Ph., Pharm.D.
Matt Snell
Jerry Treece

Voting Ctg: G Member Count: 3

Tmesys

Paul R. Cardillo
Clyde Logue

Voting Ctg: G Member Count: 2

Total P.C. Solutions, Inc.

Robin F.W. Costello

Voting Ctg: Y Member Count: 1

Transaction Assist

Philip Hosiassohn

Company Members

Voting Ctg: G Member Count: 1

Transworld Prescription Network

David Batchelor

Voting Ctg: G Member Count: 1

Two Plus Consulting

Mark Connors

Voting Ctg: Y Member Count: 1

Two Point Conversions, Inc.

Phil Lisitza

voting Ctg: Y Member Count: 1

UNISYS Corporation

Kelly Loughran
Kimberly B. Moore, R.Ph.
Ruth Tucci-Kaufhold

Voting Ctg: Y Member Count: 3

United Drugs

Elizabeth A. Schrader
Rand G. Skelton

Voting Ctg: G Member Count: 2

United HealthCare Corporation

Maureen M. Cusanelli

Voting Ctg: G Member Count: 1

United Provider Services, Inc.

Keith Dunavant, R.Ph.
Alan W. Hamm

Voting Ctg: G Member Count: 2

United Supermarkets Pharmacy

Shawn Bowe, R.Ph.

voting Ctg: P Member Count: 1

University of Wisconsin - Madison

Ted Collins, R.Ph.

Voting Ctg: Y Member Count: 1

US Department of Labor

Virginia Miller

Voting Ctg: Y Member Count: 1

US Script LLC

Robert A. Bagdasarian, R.Ph.

Voting Ctg: G Member Count: 1

Utah Department of Health

Brenda Bryant
Connie Higley

Company	Members
Voting Ctg: G	Member Count: 2
Viking Computer Services	
	Dave Peterson
Voting Ctg: Y	Member Count: 1
WAIF Computer Services	
	John Schmidt
Voting Ctg: Y	Member Count: 1
Wakefern Food Corporation	
	Dawn Carter
	Fred Onolino
	Noreen Specht
Voting Ctg: P	Member Count: 3
Wal-Mart Corporate	
	Darren K. Townzen
Voting Ctg: P	Member Count: 1
Wal-Mart Data*Net Division	
	Chad Bugos, R.Ph.
Voting Ctg: P	Member Count: 1
Wal-Mart Stores, Inc.	
	Karl L. Bedwell, R.Ph.
	Bart Easterly, R.Ph.
	Gary Howard, R.Ph.
	David Kilgo, R.Ph.
	Greg Moore, R.Ph.
	Jason R. Moore, R.Ph.
Voting Ctg: P	Member Count: 6
Walgreen Co.	
	Alan J. Berkelhamer, R.Ph.
	Barbara J. Hauck, R.Ph.
	Mike Jonas, R.Ph.
	Frank Mangham, R.Ph.
	Thomas Ochocinski, R.Ph.
Voting Ctg: P	Member Count: 5
Walgreen's Managed Care Sales	
	Joseph Noll
	Thomas Splitt
Voting Ctg: P	Member Count: 2
Walgreens Health Initiatives, Inc.	
	Richard Balow, R.Ph.
	Carl Bertram, Pharm. D.
	Jack Cantlin, R.Ph.
	Jack Folliard, R.Ph.

Company	Members
	Gregory A. Gamble, R.Ph.
	Michele D. Garvey
	Dennis J. Merrifield, R.Ph.
	Susan Powers
	Larry Sampson, R. Ph.
	Melissa Sobie
	John Thornton
	Elaine Wozniack, Pharm.D, MBA
	Elaine Wozniak
Voting Ctg: G	Member Count: 13
Watson Pharma, Inc.	
	Michael S. Proctor
	Rick Scruggs
Voting Ctg: P	Member Count: 2
Wegmans Food Markets, Inc.	
	John Carlo
	Merle Clor
Voting Ctg: P	Member Count: 2
Wellmark Blue Cross Blue Shield of Iowa	
	Nancy L. Roland
Voting Ctg: G	Member Count: 1
We//Point Pharmacy Management	
	Mary Brzezinski
	Evelyn Castruita
	Sharon Gibson
	Martin E. Honig, Pharm.D.
	Lori Long
	Debra J. Minich, R.Ph.
	Michael A. Nameth, R.Ph. MBA
	James Pickard
	Jeff Turner
Voting Ctg: G	Member Count: 9
West Park Hospital District	
	Patrick McConnell
Voting Ctg: P	Member Count: 1
WestPacific National Group, Inc.	
	Glenn Burnett
Voting Ctg: Y	Member Count: 1
Working Rx	
	Brian J. Anderson
	Todd Eaton
	Natalie Neil

Company Members

Company Members

Voting Ctg: G Member Count: 3

York Prescription Benefits Management

James Bigl

Voting Ctg: G Member Count: 1

ZENECA Pharmaceuticals

Maribeth D. Gerstenberg

Sherrita A. Snyder

Voting Ctg: P Member Count: 2

Membership count = 1148